

From: [McCarter, Jennifer](#)
To: [Jacobson, Linda](#); [Bailley, Treasure](#)
Subject: RE: sampling results for the data collected between 2015 and 2017 and results for new wells
Date: Thursday, October 29, 2020 9:05:19 AM
Attachments: [Eurofins TestAmerica report files from 280-140398-1 Xcel Energy GW CCR Monitoring - Comanche.msg](#)
[Eurofins TestAmerica report files from 280-140398-2 Xcel Energy GW CCR Monitoring - Comanche.msg](#)
[Eurofins TestAmerica report and EDD files from 280-140401-1 Xcel Energy GW CCR Monitoring - Comanche.msg](#)
[280-140401-1 Sample v4.csv](#)
[280-140401-1 TestResultQC v4.csv](#)
[280-140401-1 Batch v4.csv](#)

Round 2 reports, batch one

Jennifer McCarter, R.E.M.

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From: McCarter, Jennifer

Sent: Wednesday, October 28, 2020 1:44 PM

To: Jacobson, Linda <Jacobson.Linda@epa.gov>

Cc: Bailley, Treasure <Bailley.Treasure@epa.gov>

Subject: RE: sampling results for the data collected between 2015 and 2017 and results for new wells

Round 1 remaining reports.

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Please consider the environment before printing this email

From: McCarter, Jennifer

Sent: Wednesday, October 28, 2020 12:55 PM

To: Jacobson, Linda <Jacobson.Linda@epa.gov>

Cc: Bailley, Treasure <Bailley.Treasure@epa.gov>; Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>

Subject: RE: sampling results for the data collected between 2015 and 2017 and results for new wells

Hi Linda, this is the first email transmitting results of updated background sampling at Comanche that began in August (round 1). Due to file size, even this first round needs to be sent in two emails.

For a number of reasons, there are multiple lab reports/emails for each sampling event. Each event required a follow up site visit to sample the slow recharge wells; these samples were then submitted on a separate chain of custody, which results in a separate lab report. Radium results take 30 days, and since we requested an expedited turn around time on all other constituents, this results in a separate/lagging report for radium. The lab EDD files are

sometimes sent separately from the actual report document. Therefore, there are/will be a minimum of three lab reports/emails for each sampling event. Going forward we've asked the lab to try to consolidate and minimize number of reports where possible (ie. EDDs and reports in one email). I've started compiling a list of sample dates and lab report numbers to try to help clarify this, but in the interest of time I'll begin sending you the reports and if/when I complete that tracking tool, I'm happy to share with you. Also, these reports have not yet been through HDR's Stage 2B validation review process, and will be considered final once that review is complete (per the Data Management and Statistical Procedures Plan, 2016). HDR is also compiling all results into a spreadsheet, and I can send that as soon as it is available. If you like, I could send you interim versions as it is populated when lab reports are received; I'm not sure how helpful that will be, but let me know your preference.

Lastly, HDR will send the address and directions to the drill core warehouse, either later today or in the morning. I will be out tomorrow and Friday and will have them send it directly to you and Treasure. I'm not aware of any other EPA attendees, but if there are feel free to forward as needed. I'll see you there on Monday.

Jennifer McCarter, R.E.M.

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Please consider the environment before printing this email

From: McCarter, Jennifer

Sent: Monday, October 26, 2020 2:35 PM

To: Jacobson, Linda <Jacobson.Linda@epa.gov>

Cc: Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>

Subject: RE: sampling results for the data collected between 2015 and 2017 and results for new wells

I'll talk to HDR, that may be how they are planning to do it already, but don't know if it's updated yet with the more recent data.

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Please consider the environment before printing this email

From: Jacobson, Linda <Jacobson.Linda@epa.gov>

Sent: Monday, October 26, 2020 2:26 PM

To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>

Cc: Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>

Subject: RE: sampling results for the data collected between 2015 and 2017 and results for new wells

EXTERNAL - STOP & THINK before opening links and attachments.

Thank you, Jennifer. You are correct that those results were previously provided. We look forward to receiving the lab reports and results for the more recent groundwater samples. In addition, would it also be possible to provide the results of the new sampling in the same spreadsheet with the 2015-2017 data?

From: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>

Sent: Monday, October 26, 2020 2:15 PM

To: Jacobson, Linda <Jacobson.Linda@epa.gov>

Cc: Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>

Subject: RE: sampling results for the data collected between 2015 and 2017 and results for new wells

Linda, after our call with EPA on the 13th I realized that I had previously sent the 2015-2017 groundwater lab reports back in February and should have referenced them in our response we provided on the 7th to EPA's questions. I am happy to send them again, but wanted to check with you first on your preference as there are a lot of large files. The attached email provides the email trail of when these were sent. I thought I'd see if that helps you find them more readily and avoid clogging up your email. If not, just let me know and I'm happy to resend. I'm also working on pulling together the more recent background sampling lab reports and hope to get those out this afternoon yet, or in the morning at the latest. Thanks.

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Please consider the environment before printing this email

From: McCarter, Jennifer

Sent: Friday, October 23, 2020 4:19 PM

To: Jacobson, Linda <Jacobson.Linda@epa.gov>

Cc: Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>; Bloomberg, Jon H

<Jon.H.Bloomberg@xcelenergy.com>; Johnston, Christine E

<Christine.Johnston@XCELENERGY.COM>; Clarke, Roger A <roger.a.clarke@xcelenergy.com>

Subject: RE: sampling results for the data collected between 2015 and 2017 and results for new wells

Hi Linda,

Your inquiry is timely as I have been working this afternoon organizing a status update and next steps so that we could send you an update next week; but let me respond now to your immediate questions and requests.

We did submit the discharge permit modification application to the state today, and I have attached a copy. Christine Johnston is my colleague who is responsible for CDPS permitting, and she initially reached out to the division October 13th to ask if they could provide an expedited review. They responded that if we submitted a complete application by the 23rd, they felt they could complete their review, public notice period and issue the modified permit effective April 1, 2021. We are continuing detailed design and procurement activity for the new treatment system and expect to meet the April 11, 2021 cease receipt date for CCR wastestreams. We intend to cease receipt of non-CCR wastestreams by January 31, 2021; page

13 of the attached document is the updated timeline. Therefore, we do not plan to submit to EPA an application for extension of time to cease receipt of waste in the bottom ash pond. I'll respond separately about the lab reports due to file size.

Regards,

Jennifer McCarter, R.E.M.

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From: Jacobson, Linda <Jacobson.Linda@epa.gov>

Sent: Friday, October 23, 2020 3:29 PM

To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>

Subject: sampling results for the data collected between 2015 and 2017 and results for new wells

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Good Afternoon, Jennifer,

I am requesting the sample results for the data collected as part of your CCR program between 2015 and 2017. In your prior response, you listed the dates sampled but did not provide the sampling results. Could we also please get the sample results for the new wells? I believe you may have conducted three rounds of sampling at the new wells by now.

I thought I would just inquire on the progress being made to modify your Colorado discharge permit for your treatment system modification. If you have any information regarding this which you can share, it would be appreciated, including any submittals made to the state.

Thank you.

Linda Jacobson